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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JEAN J. SCHWARTZER,
Plaintiff,

vs.

CLARK COUNTY DISTRICT
ATTORNEY ex rel. CLARK COUNTY,
a political subdivision of the State of)
Nevada; CLARK COUNTY, a)
subdivision of the State of Nevada;)
EMPLOYEE(S) AGENT(S) DOES I-V;)
AND ROE ENTITIES I-V, inclusive,)
Defendants.)

CASE NO. 2:14-cv-00218-JAD-PAL

**STIPULATION AND ORDER TO EXTEND THE TIME TO FILE
DISPOSITIVE MOTIONS
(First Request)**

IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned respective counsel of record, that the dispositive motion deadline, currently scheduled for June 5, 2015, may be extended for a period of twenty-one (21) days, through and including June 26, 2015.

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In the Office of
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A Professional Corporation
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Las Vegas, Nevada 89129
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1 This request is made and based upon the following facts and reasons:

2 1. That discovery in this matter closed on May 7, 2015.

3 2. That depositions, many of which were of the principal parties and witnesses, were
4 taken during the last few weeks of the discovery period and were quite lengthy, in most cases
5 lasting an entire day.

6 3. That given the length and dates of the above-noted depositions, the transcripts for
7 them were not available to counsel until the week of May 25, 2015.

8 4. That the deposition transcripts will be used extensively in the parties' dispositive
9 motions and the absence of the transcripts until recently has delayed and hindered counsels'
10 ability to prepare their Motions.

11 5. That recently, counsel for the parties have been engaged in serious settlement
12 negotiations, which could well result in the settlement of the entire case.

13 6. That given the optimism of counsel concerning their negotiations, it is believed that it
14 is in the best interests of their respective clients to delay the preparation of their dispositive
15 motions pending the outcome of the settlement negotiations.

16 7. That counsel believe, and thereon allege, that if the Court grants them the requested
17 extension, they will be able to conclude their settlement negotiations and if, unsuccessful, have
18 sufficient time to file their dispositive motions on or before June 26, 2015.

19 8. That this is the first request that counsel have made to extend the dispositive motion
20 date and that said request is made in good faith and not merely for the purposes of delay.

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1 WHEREFORE, the parties respectfully request that the Court enter an Order extending
2 the current dispositive motion filing date of June 5, 2015, for a period of twenty-one (21) days,
3 through and including June 26, 2015.

4 DATED this 28th day of May, 2015.

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6 LAW OFFICES OF
STEVEN J. PARSONS

OLSON, CANNON, GORMLEY
ANGULO & STOBERSKI

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8 BY: /s/ Andrew L. Rempfer
ANDREW L. REMPFER, ESQ.
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Attorney for Plaintiff

BY: /s/ Walter R. Cannon
WALTER R. CANNON, ESQ.
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9950 W. Cheyenne Avenue
10 Las Vegas, Nevada 89129
Attorney for Defendants

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12 **ORDER**

13 IT IS SO ORDERED.

14 DATED this 2nd day of June, 2015.

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PEGGY A. LEEN
17 United States Magistrate Judge

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